

November 1, 2002

William Maher
Chief, Wireline Competition Bureau
Federal Communications Commission
Portals II
445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 96-98, Petition of the Connecticut Department of Public Utility Control for Authority to conduct a Voluntary Unassigned Number Porting Trial and Docket No. 01-05-18, DPUC Intent to Conduct a Voluntary Unassigned Number Porting (UNP) Trial

Dear Mr. Maher:

The Connecticut Department of Public Utility Control (CTDPUC or Department) acknowledges receipt of your May 14, 2001 letter on behalf of the Federal Communications Commission (FCC or Commission) authorizing the Department to conduct an Unassigned Number Porting (UNP) trial (Trial) in Connecticut. The Commission also requested that prior to the Department's implementation of the UNP trial, that CTDPUC provide the FCC with a number of reports so that it can assess the feasibility of UNP as a national numbering resource optimization strategy. In order to facilitate the Department's implementation of the Connecticut UNP trial and properly respond to the Commission, the above noted docket was initiated.

From the initiation of Docket No. 01-05-18, the CTDPUC has sought the industry's input in order to properly report to the Commission as well as maximize telecommunications service providers' participation in the Connecticut trial. Specifically, the CTDPUC solicited industry input through formal requests for written comments. The Department has also conducted several technical meetings and workshops wherein the industry's comments concerning the trial were discussed. Copies of the Department's requests for written comments and notices of technical meetings have been appended hereto as Attachment 1.

In addition, the Department has been assisted in the development of the Connecticut UNP Trial by NeuStar, Inc. (NeuStar). With the input from members of the industry participating in this proceeding, NeuStar has drafted Administration Guidelines (Guidelines) that will be relied upon by the carriers participating in the Connecticut trial. A copy of the Guidelines is appended hereto as Attachment 2.

CTDPUC intends to commence a two-phased UNP trial beginning on November 1, 2002, that will be open to all providers certified to offer telecommunications services in the state. This trial was designed by the participating service providers to allow for maximum voluntary participation and employs the use of a surrogate form of UNP during Phase I and the actual porting of individual telephone numbers between service providers during Phase II. Specifically, during Phase I, a surrogate UNP trial will be conducted for three months wherein participating carriers would request telephone numbers (TN) from the industry's pooling inventory. At the conclusion of the three-month period, the data will be reviewed by CTDPUc and the industry group in order to determine whether to conclude the trial, continue Phase I or immediately move to Phase II of the trial. During Phase II, carrier to carrier exchanges of TNs in inventory for use by the receiving carrier for growth or footprint resources would occur wherein participating service providers will request telephone numbers from each other providers' inventories that would not involve a third party administrator.

Throughout the course of the CTDPUc/Industry Group UNP Technical Meetings, Cox Connecticut Telcom, L.L.C (Cox) expressed concern that the trial must immediately enter Phase II. Cox also indicated a strong desire to start Phase II before analysis of Phase I was complete.¹ However, many members of the industry group stated that moving to Phase II was not an automatic assumption. AT&T Communications indicated that it would not participate in the trial if Cox's suggestion was accepted. Similar concerns were expressed by other industry participants. In addition, the Southern New England Telephone Company suggested that the results of Phase I be analyzed before Phase II was initiated. Therefore, in light of those concerns, CTDPUc accepted the two-phased approach to trial UNP in Connecticut.

Because Phase I of the trial will rely on access to pooled blocks of TNs, a third-party administrator (i.e., the National Pooling Administrator) is required. By letter dated December 21, 2001, the Department requested the Commission's approval to permit the National Pooling Administrator's (PA) assistance with the Connecticut UNP trial. The Commission approved the Department's request in May, 2002.

It is noted that in its May 14, 2001 letter, the Commission requested the Department submit an initial report prior to the commencement of the trial in order to facilitate the Commission's assessment of the feasibility of UNP as a national numbering resource optimization strategy. The following is the Department's responses to the Commission's requests:

¹ On two separate occasions, Cox also requested that the CTDPUc direct the industry to implement an UNP trial immediately, to run concurrently with Phase I of the Connecticut UNP trial, or in the alternative, direct the industry to develop guidelines for a UNP trial by year-end 2002, for implementation 30 days after completion of those guidelines. On October 8, 2002, CTDPUc responded to Cox. A copy of that response is appended here to as Attachment 3.

1. **Describe the purposes for which UNP will be permissible (e.g., specific customer requests for a particular number(s); establishing carrier footprints with small quantities of numbers; inventory building; inventory reduction), and what a carrier must demonstrate in each instance (e.g., proof of a customer contract).**

Service Provider (SP) requests for TNs may be for footprint or growth. The same federal utilization, months-to-exhaust, and other criteria that currently apply for block or NXX requests will apply for requests for TNs in the Trial. If a SP requests numbers under the Trial, but does not meet the above noted criteria, it may submit a request to the Department for a waiver.

2. **Describe how UNP will be administered (e.g., through a central administrator, through carrier-to-carrier administration). If carrier-to-carrier, what "rules" will apply (e.g., to prevent inadvertent ports or ports made in error)?**

The UNP trial will be administered through a central administrator pursuant to the guidelines at Attachment 2, pp. 6-8.

3. **Specify the procedures to be followed by all parties (e.g., porting carrier, ported-to carrier, administrator, if applicable) involved in the transaction (e.g., who initiates the request for a port; who verifies that the requested port is permissible and meets the qualifying criteria).**

Requesting SPs will follow the same procedures that they normally would follow when requesting blocks (1K or 10K) of telephone numbers. Specifically, requesting SPs will be responsible to complete all appropriate forms (including identifying the appropriate Operating Company Number [OCN], parent company OCN, Administrative Operating Company Number [AOCN], switch ID and Tens-Block effective date, etc.). The Administrator will be responsible to receive all requests for tens-block unassigned numbers from the SPs and validate the requests to ensure each applicant meets the criteria to request tens-block numbers; verify that the applicant has completed the appropriate forms containing the pertinent information; assist industry inventory pool participants, as necessary, with the completion of all Tens-Block forms; select the specific unassigned numbers for assignment, or provide the reason to the SP why the assignment cannot be made; and respond to the applicant's request(s) within 7 calendar days following receipt of the request.

4. **Will audits be performed to ensure compliance with established procedures? If yes, what type of audits will be conducted (e.g., random audits) and who will conduct such audits?**

In the performance of its duties and in meeting its responsibilities, the Administrator may encounter situations that may alert them to a possible noncompliance with the industry guidelines which warrants the need for an audit. In these situations, the Administrator will inform and forward relevant information, which contains the details of the possible infraction to the designated auditor or appropriate regulatory agency for disposition. The Administrator may also be required to provide SP specific data to an auditor in order to facilitate the audit process.

SPs requesting resources from the industry pool shall be subject to audits to assure compliance with the Guidelines and Trial processes and principles. Audits will be conducted by a designated neutral party to:

- a. ensure uniformity in application of these guidelines by the Administrator to all unassigned number requests received by the Administrator;
- b. ensure compliance with these guidelines by SPs and the Administrator; and
- c. ensure the efficient and effective use of numbering resources by Applicants/Holders and efficient and effective management of numbering resources by the Administrator.

5. Describe the dispute resolution procedures between carriers for inadvertent ports or ports made in error.

In cases of inadvertent ports or ports made in error, the procedures followed when TNs are inadvertently ported or numbers ported in error when numbers are ported for local number portability purposes will be followed. Carrier disputes would be addressed by the Department once they have been raised by the affected party(ies).

6. Describe any limitations on porting (within certain rate centers only or state-wide; the amount of numbers that may be ported per request; whether a carrier may deny another carrier's request for numbers under certain circumstances and a description of those circumstances).

The Trial will be conducted in all areas of Connecticut where pooling has been implemented except for the Woodbury Telephone Company service territory. One pooled block will be used in the Trial for each rate area. Only Requests for TNs will be in quantities of 10, but no limit on the total quantity of numbers

requested except that a carrier requiring more than 500 numbers would request a pooled block assignment rather than making its requests as part of the Trial.

7. **Describe which carrier(s) will cover the cost of porting, and if that coverage will differ depending on the purpose for which a port is sought. Describe any plans to permit carrier cost recovery.**

Carriers will be responsible for their own costs incurred during the Trial.

8. **Describe any carrier reporting requirements (e.g., will carriers donating and receiving ported numbers be required to supplement their Numbering Resource Utilization and Forecasting (NRUF) reporting whenever a port takes place, or periodically -- e.g., either every 6 months with their scheduled NRUF report submissions or at some other interval). Will carriers be permitted to aggregate and report ported numbers at the rate center level or at the NPA level, and will the reporting level depend on the quantity of numbers being reported?**

NRUF report submissions would be submitted by the Pooling Administrator in the same manner as contaminated blocks are reported today.

Sincerely,

DEPARTMENT OF PUBLIC UTILITY CONTROL

Louise E. Rickard
Acting Executive Secretary

cc: Service List

Attachment 1

DOCKET NO. 01-05-18

DPUC INTENT TO CONDUCT
A VOLUNTARY UNASSIGNED
NUMBER PORTING (UNP) TRIAL

NOTICE OF TECHNICAL MEETING
(July 26, 2001)

A technical meeting of the Department of Public Utility Control (Department), staff and representatives of the Parties and Intervenors admitted to this proceeding, will be held at the offices of the Department, Ten Franklin Square, New Britain, Connecticut, on Thursday, July 26, 2001, at 10:00 a.m. The purpose of the meeting will be to discuss the Department's implementation of a voluntary Unassigned Number Porting trial in Connecticut.

Dated at New Britain, Connecticut this 7th day of June, 2001.

DEPARTMENT OF PUBLIC UTILITY CONTROL

Louise E. Rickard
Acting Executive Secretary

By:

Peter J. Jenkelunas

(GAK)

DOCKET NO. 01-05-18

DPUC INTENT TO CONDUCT
A VOLUNTARY UNASSIGNED
NUMBER PORTING (UNP) TRIAL

NOTICE OF REQUEST FOR WRITTEN COMMENTS AND TECHNICAL MEETING

(August 15, 2001)

(August 27, 2001)

During the July 26, 2001 Technical Meeting in the above noted docket, several issues and questions were raised concerning the Department of Public Utility Control's (Department) intent to conduct an unassigned number porting (UNP) trial. The issues raised concerned the following:

Trial Scope

Time frame and length of trial

Trial Participants (i.e., ILECs, CLECs, CMRS?)

How will the trial end

Evaluation of the trial results

Role of Administrator

Costs and who is responsible for their recovery

What happens to ported telephone numbers (TN) at the end of the trial?

Evaluation of the trial results

Guidelines

Work being done by Industry Numbering Committee and NANC Expansion and Numbering Optimization (NENO) on UNP guidelines

Snapback

Efficient Data Representation (EDR) Issues

How will the general numbering and 1,000 block pooling rules/guidelines apply during the trial – separate guidelines for the trial

Numbers for footprint vs. numbers for customer request

Coordination with North American Numbering Plan Administrator (NANPA), Pooling Administrator (PA), and Number Portability Administration Center (NPAC)

Administrative Role of the LECs

Manual Processing of TNs

-- May require limiting of total ported numbers

Trouble Reporting

Pseudo Account

Impact on Ancillary Services

-- 911, Operator Services, etc.

Forecast and Utilization Processes

NANPA & Pool Block Administrator

Assigned TNs vs Intermediate TNs

Wireless Participation

Other

Vanity Numbers

Multi-Rate Switches

The Department is of the opinion that these issues require further investigation and discussion before the UNP trial can be initiated. The above listing of issues is not meant to be inclusive. Participants may add to the issues; however, as indicated below, written comments discussing those issues must be filed with the Department.

The Department has determined that additional technical meetings or workshops conducted by staff would provide the best means by which investigation of these issues may be addressed. A schedule for those technical meetings and the issues that will be addressed during those meetings is as follows:

<u>Written Comments Due</u>	<u>Topics to Be Addressed</u>	<u>Technical Meeting Date</u>
August 15, 2001	Trial Scope	August 27, 2001
August 22, 2001	Guidelines Administrative Role of the LECs	September 7, 2001
August 29, 2001	Forecast and Utilization Processes Wireless Participation Other	September 13, 2001

The Department hereby announces that the above noted Technical Meetings will be held at the offices of the Department, Ten Franklin Square, New Britain, Connecticut, commencing at 10:00 a.m.

In order to facilitate discussion during the scheduled workshops, the Department will require that written comments concerning the issues that will be addressed during the scheduled technical meeting be filed with the Department in advance of that meeting date. Written comments for each technical meeting must be filed with the Department no later than the date indicated above. Filed comments should include a detailed discussion of the issue, the participant's concerns and a proposed solution that addresses those concerns.

The Department directs that an original and 10 copies of all material submitted in this docket, including cover letter, be filed with the Executive Secretary of the Department, Ten Franklin Square, New Britain, Connecticut no later than two weeks prior to each scheduled workshop when the issue is expected to be discussed. An electronically formatted copy of all material submitted in this docket shall also be

provided to the Department. The Department prefers that the electronically formatted copy be in Microsoft Word for Windows 6.x format, but Microsoft Word for Windows 2.x or Word Perfect 5.x or 6.x formats will be accepted.

Dated at New Britain, Connecticut, this 2nd day of August, 2001.

DEPARTMENT OF PUBLIC UTILITY CONTROL

Louise E. Rickard
Acting Executive Secretary

DOCKET NO. 01-05-18

DPUC INTENT TO CONDUCT
A VOLUNTARY UNASSIGNED
NUMBER PORTING (UNP) TRIAL

NOTICE OF RESCHEDULED TECHNICAL MEETING
(August 30, 2001)

By Notice of Request for Written Comments and Technical Meeting, dated August 2, 2001, the Department of Public Utility Control (Department), announced a Technical Meeting would be held on Monday, August 27, 2001, at 10:00 a.m., at the offices of the Department. The Department hereby announces that a Rescheduled Technical Meeting with staff and representatives of the Parties and Intervenors admitted to this proceeding, will be held at the offices of the Department, Ten Franklin Square, New Britain, Connecticut, on Thursday, August 30, 2001, at 10:00 a.m. The purpose of the meeting will be to discuss the Scope of the UNP Trial.

Dated at New Britain, Connecticut this 15th day of August, 2001.

DEPARTMENT OF PUBLIC UTILITY CONTROL

Louise E. Rickard
Acting Executive Secretary

By:

Kenneth L. Braffman

(GAK)

DOCKET NO. 01-05-18

DPUC INTENT TO CONDUCT A
VOLUNTARY UNASSIGNED NUMBER PORTING (UNP) TRIAL

NOTICE OF REQUEST FOR WRITTEN COMMENTS
(October 19, 2001)

On August 10, 2000, the Department of Public Utility Control (Department) petitioned the Federal Communications Commission (FCC) for authority to conduct a voluntary unassigned number porting (UNP) trial in Connecticut (Petition). By letter dated May 14, 2001, the FCC approved the Department's Petition. The Department has conducted Technical Meetings on July 26, 2001, August 30, 2001 and September 7, 2001, to address implementation of the trial.

During the August 30, 2001 Technical Meeting in this proceeding, participants indicated that in order for the UNP Trial to proceed, the trial must be well-defined and the guidelines under which it would be conducted, detailed. Tr. 8/30/01, pp. 124-130. The Department agrees with the participants' comments and as a starting point for discussion purposes for a future technical meeting, has attached a copy of the draft UNP Business Rules that were developed from the Unassigned Number Porting Trial between Focal Communications and MCI WorldCom. Tr. 8/30/01, p. 170. The Department seeks comments concerning the UNP Business Rules that address the areas below. The Department does not intend that these rules be all-encompassing; rather, they have been provided as a means of developing guidelines by which the UNP Trial can be conducted in Connecticut. In drafting their proposed comments, participants should address: 1) the degree of detail present in the proposed UNP Business Rules (e.g., are they too detailed or should they be amended to provide more detail and perhaps less flexibility to the trial participants during the trial); 2) the adequacy of the proposed UNP Business Rules, (e.g., what is missing, what should be deleted, etc.); and 3) any other relevant comments.

The Department directs that an original and 10 copies of all material submitted in this docket, including cover letter, be filed with the Executive Secretary of the Department, Ten Franklin Square, New Britain, Connecticut no later than October 19, 2001. An electronically formatted copy of all material submitted in this docket shall also be provided to the Department. The Department prefers that the electronically formatted copy be in Microsoft Word for Windows 6.x format, but Microsoft Word for Windows 2.x or Word Perfect 5.x or 6.x formats will be accepted.

Dated at New Britain, Connecticut, this 17th day of September, 2001.

DEPARTMENT OF PUBLIC UTILITY CONTROL

Louise E. Rickard
Acting Executive Secretary

DRAFT UNP BUSINESS RULES

Types of UNP Requests:

1. UNP for Footprint
 - Any Number/Range of Numbers within rate area
 - Any Number/Range of Numbers within specific NPA and rate area
2. UNP for Customer Specific Number Requests
 - 10-digit number(s)
 - Number/Range of Numbers within NPA-NXX
 - Any Number/Range of Numbers within NPA and rate area

Highlights General Rules:

- Participating carriers must be LNP-capable.
- Carriers submitting a footprint are in essence certifying that they do not have existing resources in the given rate area.
- Use of existing porting processes will be used in UNP, with slight modifications to LSRs. In addition to Exhibit A, standard forms and nomenclature will be used.
- UNP will not require a third party administrator.
- Donated UNP numbers for customer-specific purposes are to be defined by the donor carrier as “ported out” in utilization reports.
- Donated UNP numbers for footprint purposes are to be defined by the donor carrier as “intermediate” in utilization reports.
- Audits of carrier inventories (e.g., state regulator, 3rd party auditor, etc.) will serve as verification of UNP ported-out/ported-in numbers.
- Footprint requests for any specific recipient carrier, are limited to an amount equal to or less than a total of 25 TNs per rate center.
- Specific customer requests are limited to those required for customer need.
- Non-specific requests for footprint and/or customer-specific UNP (i.e., non-specific because of multiple potential donors within the rate area and number request is for any number(s) within the NPA/rate area) should be accommodated initially by requesting from the carrier to whom resources were donated within the LATA, during the COCUS reporting period. Otherwise, the state staff at their option, they will determine the donor carrier. If the foregoing does not apply, then the requesting carrier will use a round robin (e.g., rotation through the list of carriers) approach to determine the donor carrier. Repeated requests of a single carrier to a single donor should be avoided if at all possible.
- UNP used for customer requests will not require sharing the customer-specific information.
- Donor carriers will replenish inventories as customarily done in the normal course of their number administration processes. Thus, the donor carrier will

not apply for additional resources every time a request for UNP numbers is received.

- Donor carriers, once identified, will not be allowed to refuse UNP requests for any reason except: lack of available numbers; extreme jeopardy when exhaust of its inventory is imminent; and when there are no growth resources available from the pooling or CO Code administrator. The guiding principle for customer-specific requests is that if the end-user would have access to the numbers desired from the donating carrier and then porting them, those numbers should be ported for UNP.
- All carriers should maintain logs of UNP requests and donations including resultant actions for audit purposes.
- The requesting carrier should check the availability of numbers by dialing the specific number or several numbers within a range prior to submitting the request. This does not apply for non-specific footprint requests or customer-specific requests for any number(s) in the NPA and rate area.

UNP for Footprint

The Requesting Carrier checks the LERG to identify possible Donor Carriers in the rate center/centers in which it needs TNs.

If there is a single carrier in the rate center in which the Requesting Carrier needs TNs, that carrier becomes the “default” Donor Carrier. Otherwise the non-specific donor identification will be used.

An example of an internal UNP administration process is described in Exhibit B.)

Normal time frames for porting (i.e. four-day interval) are applicable once the LSR is submitted.

The LSR process is as follows:

Requesting SP – Footprint UNP

1. Send Local Service Request – UNP LSR
2. **Receive Firm Order Confirmation (FOC) that TNs reserved for requesting SP**
3. Upon receipt of FOC, send Create message to NPAC
4. On customer due date, send Activate message to NPAC
5. Make test calls from major carriers (ILEC, AT&T LD, Sprint LD, MCI LD)
6. Make test calls from within new receiving switch
7. Have donating SP make test calls from donor switch
8. Verify all test calls complete to receiving switch (new requesting SP)

Donating SP – Footprint UNP

1. Receives LSR for UNP
2. Return confirmation (FOC) that TNs reserved, w/ tracking number

3. **Send Create concurrence message to NPAC (LNP process proceeds normally)**
4. Make test calls, per new SP, from donor switch

The 911 record will be created by the recipient carrier once the number is assigned to an end-user.

UNP for Specific Number upon Customer Request

The Requesting Carrier checks the LERG to identify the carrier holding the NPX-NXX that contains the specific number or range of numbers.

In cases where the customer requests a single number (or a few, possibly up to three), the Requesting Carrier will call the TN(s) requested by the customer to see if it is in use prior to submitting the Reservation LSR as described in Exhibit A. The Requesting Carrier will then submit a LNP LSR to the Donor Carrier to initiate the porting process.

In cases where the customer requests a range of numbers, the Requesting Carrier submits a Reservation LSR to the Donor Carrier. The Requesting Carrier must check availability of the range by dialing various numbers in the range prior to submitting the LSR request. The Requesting Carrier will then submit a LNP LSR to the Donor Carrier to initiate the porting process.

Donor Carrier responds to Requesting Carriers within one business day as to availability of the TN(s). If the TN(s) is (are) available, the normal porting process is followed. Normal time frames for porting (i.e. four-day interval) are applicable once the LSR is submitted.

The LSR process is as follows:

Requesting SP - Customer-Specific UNP

1. Send Reservation Local Service Request (LSR) for UNP
2. Receive Firm Order Confirmation (FOC) that TNs reserved for requesting SP
3. Send LSR for UNP w/tracking number from previous FOC and customer due date
4. Upon receipt of FOC, send Create message to NPAC
5. On customer due date, send Activate message to NPAC
6. **Make test calls from major carriers (ILEC, AT&T LD, Sprint LD, MCI LD)**
 7. Make test calls from within new receiving switch
 8. Have donating SP make test calls from donor switch
 9. Verify all test calls complete to receiving switch (new requesting SP)

Donating SP - Customer-Specific UNP

1. Receives Reservation LSR for UNP
2. Return confirmation (FOC) that TNs reserved, w/ tracking number
3. Receives LSR for UNP w/tracking number from previous FOC and customer due date
4. Return FOC for LSR for UNP
5. Send Create concurrence message to NPAC
6. Make test calls, per new SP, from donor switch

The 911 record will be created by the recipient carrier once the number are activated or in use by the end-user.

Audits

The appropriate audit tests should be developed to test donor and requesting service provider compliance. Both the donor and the recipient carriers have an obligation to cooperate in the event of an audit in a timely fashion. Audits inherently have a "snapshot" aspect to them. Thus, for example, a Requesting Carrier's inventory can be evaluated on a given date upon which a request for UNP numbers was made to ensure that the carrier could not meet the customer request from its own inventory. Similarly, a potential donor's inventory could be evaluated if a UNP request was denied.

If an carrier is forced to open a 1K block to fulfill a UNP request, the numbers are marked as ported out, which is a legitimate reason to open a block. If a controversy arises, the receiving carrier must be prepared to document its request and need.

Parking Lot – (Footprint Request)

If the default Donor Carrier cannot accommodate the request with its inventory, the Requesting Carrier should apply for a block from the pooling administrator.

In a non-pooling area, if the default Donor Carrier cannot accommodate the request with its inventory, the Requesting Carrier should apply for a full CO Code. In the alternative, the default carrier can apply for a CO Code and apportion the costs associated with application and activation to the Requesting Carrier. (Example, 25 numbers of 10,000 numbers equals 0.25 percent of the costs.) Forecasts must support the need for the donor to obtain a full CO code as well as the Requesting Carrier's need for a minimal quantity of numbers.

If there are multiple carriers in the rate center in which the Requesting Carrier needs TNs, the Requesting Carrier selects an appropriate Donor Carrier

based on previous interactions. Specifically, Requesting Carriers make every attempt to make requests of multiple Donor Carriers; making a second request of a single carrier should be the last option when other potential donors are available and are able to satisfy the request.

Requesting Carriers, as a first option when there are multiple possible donors, make requests of carriers to whom they have previously donated TNs for UNP, for either footprint in another rate center or for customer requests.

Parking Lot (Customer-Specific)

Donor Carrier inventories will not be significantly affected by requests for single numbers or small quantities of numbers based upon Customer Requests. If Customer Requests are for several dozens, for example, and the Donor Carrier inventory consequently falls below the six-month level, the donor can apply for additional resources and apportion the cost to the Requesting Carrier. This applies in both pooling and non-pooling areas. (Example, 25 numbers of a thousand block equals 2.5 percent of costs. 25 numbers of 10,000 is 0.25 percent of costs.)

DOCKET NO. 01-05-18

DPUC INTENT TO CONDUCT
A VOLUNTARY UNASSIGNED
NUMBER PORTING (UNP) TRIAL

NOTICE OF RESCHEDULED TECHNICAL MEETING
(October 12, 2001)

By Notice of Request for Written Comments and Technical Meeting, dated August 2, 2001, the Department of Public Utility Control (Department), announced a Technical Meeting would be held on Friday, September 7, 2001, at 10:00 a.m., at the offices of the Department. The Department announced that the Technical Meeting would be continued to Friday, September 21, 2001, at 10:00 a.m. The Department hereby announces that a Rescheduled Technical Meeting with staff and representatives of the Parties and Intervenors admitted to this proceeding, will be held at the offices of the Department, Ten Franklin Square, New Britain, Connecticut, on Friday, October 12, 2001, at 9:00 a.m. The purpose of the meeting will be to discuss the Forecast and Utilization Processes, Wireless Participation and any other relevant topics of the Connecticut UNP Trial.

Dated at New Britain, Connecticut this 18th day of September, 2001.

DEPARTMENT OF PUBLIC UTILITY CONTROL

Louise E. Rickard
Acting Executive Secretary

By:

Peter J. Jenkelunas

(GAK)

DOCKET NO. 01-05-18

DPUC INTENT TO CONDUCT A
VOLUNTARY UNASSIGNED NUMBER PORTING (UNP) TRIAL

CANCELLATION OF REQUEST FOR WRITTEN COMMENTS
(October 19, 2001)

By Notice of Request for Written Comments (Notice) dated September 17, 2001, the Department of Public Utility Control (Department) requested participants admitted to this docket to file comments concerning the UNP Business Rules that addressed certain areas (see Notice). On October 12, 2001, the Department staff held a technical meeting with the admitted participants to this docket to discuss the Forecast and Utilization Processes, Wireless Participation and any other relevant topics of the Connecticut UNP Trial. At the conclusion of the meeting it was determined that comments were no longer needed and the Department hereby cancels its Request for Written Comments due October 19, 2001.

Dated at New Britain, Connecticut, this 12th day of October, 2001.

DEPARTMENT OF PUBLIC UTILITY CONTROL

Louise E. Rickard
Acting Executive Secretary

ATTACHMENT 2



CONNECTICUT

Modified - UNP Trial (NXX-XXX BLOCK NUMBER PORTING)

ADMINISTRATION GUIDELINES

11/1/02

Disclaimer: This Modified - UNP Trial is not "UNP" as defined by the FCC. However, it will demonstrate the number utilization impact of "UNP." Thousands-blocks already donated for pooling will be identified as part of the Modified – UNP Trial to operate as if they were existing inventory from “surrogate” carriers.

TABLE OF CONTENTS

1.0	Purpose and Scope	3
2.0	Assumptions and Constraints.....	4
3.0	Unassigned Number Assignment Principles	5
4.0	Service Provider Responsibilities	6
5.0	Administrator Responsibilities	6
5.1	General Administration Duties.....	6
5.2	Assignment Processes.....	7
5.3	Reporting Processes	8
5.4	Audits	8
6.0	Allocation of Tens-Blocks.....	9
6.1	Criteria for Tens-Block Number Allocation	9
6.2	Application Process.....	9
6.3	Process for Allocation of Tens-Blocks	10
6.4	Expedite Process for Tens-Block Allocation.....	10
7.0	Appeals Process	11

TENS-BLOCK APPLICATION FORMS

Attachment 1	Part 1A	Tens-Block Application Form
Attachment 2	Part 3	Tens-Block Response/Confirmation Form
Attachment 3	Part 4	Tens-Block In Service Confirmation Form
Appendix 1	Tens-Block User Profile Application	

1.0 Purpose and Scope

This document specifies guidelines for the administration and assignment of unassigned numbers to Local Number Portability (LNP)-capable service providers (SPs) participating in the Modified - UNP Trial for use at a switching entity or point of interconnection (POI) they own or control. In facilitating its assessment of the feasibility of UNP as a national numbering resource optimization strategy, the Federal Communications Commission has requested that the Connecticut Department of Public Utility Control provide its Common Carrier Bureau with information concerning the implementation of UNP in Connecticut. The industry in Connecticut has proposed and will implement an initial trial phase that utilizes a third party administrator that manages and administers blocks of ten consecutive telephone numbers. All unassigned number requests and necessary forms will be submitted by SPs to the Administrator by filling out the appropriate form on the Administrator Web Site.² No form submissions will be accepted via fax, paper, voice, or email, except in extraordinary circumstances and/or if previously agreed to by the Administrator. An industry database (see 5.1.(g)) will verify the password and access level of the user. All electronic submissions from an authorized user will be considered as an electronic signature and will be verified for authenticity utilizing criteria maintained in the Administrator database. In addition, these guidelines outline the processes used between the Administrator and:

- Local Exchange Routing Guide (LERG) Assignees
- The 1K Pooling Administrator
- Number Portability Administration Centers (NPAC)
- Regulatory Agencies

Unassigned number porting, in the context of these guidelines, allows for sharing of numbers in individual tens-blocks (NPA-NXX-XXX) among multiple SPs serving the same rate area. All ten thousand telephone numbers (TNs) within each NXX Code continue to be associated with the same rate area designation (i.e., V&H coordinates), but can be distributed among multiple SPs at the unassigned number (NPA-NXX-XXX) level.

Where unassigned number porting has not been implemented, or is not in use by a SP, the SP shall continue to apply directly to the CO Code Administrator or 1K Block Pooling Administrator (PA) for numbering resources. For numbering needs

² A profile for each authorized user will be contained in the industry database, as documented in Section 5.1.1. Only those users with a valid profile will be permitted to submit applications or changes on behalf of a SP. (See Appendix 1)

in a rate area expected to exceed 500 numbers, SPs shall apply for resources directly from the 1K Block Pooling Administrator. Guidelines addressing the assignment of Central Office Codes (NXXs) are covered under the Central Office Code (NXX) Assignment Guidelines (INC 95-0407-008). Guidelines addressing the assignment of Thousands-Blocks (NXX-Xs) are covered under the Thousands-Block (NXX-X) Pooling Assignment Guidelines (INC 99-0127-023).

These guidelines do not supersede appropriate North American Numbering Plan (NANP) area governmental or regulatory principles, procedures, and requirements.

2.0 Assumptions and Constraints

The development of these Modified - UNP Trial Administration Guidelines is based on the following assumptions and constraints:

- 2.1 NANP resources, including those covered in these guidelines, are collectively managed by the telecommunications industry often with oversight by the regulatory authorities in areas served by the NANP. The decision to establish a tens-block number pool in any given location is a regulatory responsibility.
- 2.2 The Administrator will obtain the necessary SP documentation to establish and administer the tens-block number pool.
- 2.3 These administration guidelines apply only to the assignment of tens-block numbers to Applicants providing service within most rate areas:
 - a) where SP Location Routing Number (LRN) Local Number Portability (LNP) has been implemented; and
 - b) where Modified - UNP has been mandated by the appropriate regulatory body; or
 - c) where Modified - UNP has been voluntarily implemented for trial purposes by participating SPs.
- 2.4 These administration guidelines were prepared jointly by NeuStar and the Connecticut Industry to be followed on a voluntary basis.
- 2.5 Applicants requesting resources from the tens-block number pool:
 - a) must be licensed or certified to operate in the rate area, as required, and must demonstrate that all applicable regulatory approvals required to provide the service for which the unassigned number is required have been obtained;

- b) Must have a valid NRUF on file;
 - c) shall establish internal policies and practices that provide for the efficient use and assignment of TNs to end users. These policies and practices shall balance product specifications, market strategies and customer needs with conservation principles to ensure “best practices” in TN utilization;
 - d) shall minimize the use of TNs within tens-blocks for purposes other than subscriber assignments (e.g., test numbers);
 - e) shall be subject to audits to assure compliance with these guidelines, processes and principles (see Section 5.4); and
 - f) shall be capable of providing service within sixty (60) days of the numbering resource activation date for applications for initial resources within the rate center.³
- 2.6 The schedule of holidays recognized by the Administrator will affect the administration of these guidelines. Holidays will not be considered a “calendar day” as a part of any timing of unassigned number allocations in association with these guidelines.
- 2.7 Audits of the Administrator and Unassigned Number Applicants/Holders, will be performed by a designated neutral party to:
- a) ensure uniformity in application of these guidelines by the Administrator to all unassigned number requests received by the Administrator;
 - b) ensure compliance with these guidelines by Applicants and the Administrator; and
 - c) ensure the efficient and effective use of numbering resources by Applicants/Holders and efficient and effective management of numbering resources by the Administrator.
- 2.8 These guidelines were developed assuming that tens-block numbers assigned to a carrier would be immediately ported by the receiving carrier rather than the numbers being left in the administrator's number pool and ported one-by-one only as the numbers were eventually assigned to end-users.

³ FCC 00 104, §52.15; (g), (2), (ii)

- 2.9 Changes to the INC Guidelines will be reviewed for potential changes to the Modified UNP Guidelines where applicable.

3.0 Unassigned Number Assignment Principles

The following assignment principles apply to all aspects of these guidelines:

- 3.1 The Administrator will sequentially assign tens-blocks to block applicants from the available inventory.
- 3.2 An SP's requirement for more than 500 numbers, a 1K block, or NXX Code (i.e., 10,000 TNs), shall be obtained from the Pooling Administrator, not the Modified - UNP Administrator or CO Code Administrator.
- 3.3 Numbering resources in the tens-block number pool shall be available and allocated to SPs in a fair and non-discriminatory manner (i.e., on a first come, first served basis).
- 3.4 The information required of applicants for unassigned number assignments shall be kept to a minimum and shall be uniform for all applicants. All information provided on the Tens-Block Number Application Forms, Part 1A (Attachment 1) will be considered confidential.
- 3.5 Numbers received in tens-block assignments have the same rate area restrictions that the pooled block from which they're assigned has: the NPA-NXX rate area association of the block must be honored by the tens-block assignee in its assignment of the tens-block numbers to its end-users. All SP rate area boundaries, which cover the same geographic area, will participate in a single tens-block number pool.
- 3.6 Any SP that is denied the assignment of one or more tens-block(s) under these guidelines has the right to appeal that decision per Section 7.0.
- 3.7 Where Modified - UNP has been implemented, the Administrator will assign numbering resources in increments of 10 sequential numbers from pristine blocks where possible. The tens-blocks will be assigned beginning with the units digit 0 and ending with 9. Resources will be available for assignment from both contaminated and pristine thousands-blocks contained in the tens-block number pool. Contamination occurs when at least one telephone number within a 1K block of telephone numbers is not available for assignment to end users or customers. If TNs are provided from a contaminated block, not all numbers within some of the ten-number increments released by the administrator will be available for assignment to an end-user by the carrier receiving the tens-block. For purposes of this provision, a telephone number is "not available for assignment" if it is classified either a pending or active ported

number shown at NPAC:⁴

4.0 Service Provider Responsibilities

See Section 2.5

5.0 Administrator Responsibilities

The following describes the high level responsibilities of the Administrator in:

- 1) General Administration Duties
- 2) Assignment Processes
- 3) Reporting Processes
- 4) Audits

Detailed Administrator responsibilities are described in the appropriate process sections of these guidelines.

5.1 General Administration Duties

The Administrator, upon request, shall provide information and answer questions for clarification regarding Modified - UNP Trial administration processes, procedures, interfaces, and services. Additionally, the Administrator shall provide, upon request of the Modified - UNP Trial participant, information on how to obtain documents related to Modified - UNP Trial administration. This can be accomplished by either referring the SP to web sites where it will be possible to download electronic copies, or by providing electronic copies via e-mail.

The Administrator shall:

- a) be responsible for activities associated with the tens-block number pool establishment;
- b) assure the availability, based upon industry established criteria, of numbering resources within the tens-block pool for a given rate area;
- c) provide copies of the Modified - UNP Trial guidelines when requested by Modified - UNP block applicants, including timely notification of changes;
- d) assist the CO Code Administrator and Pooling Administrator in analyzing and helping to resolve problems related to misrouted calls and calls that cannot be completed;

⁴ Refer to FCC 00-104 (See Appendix Z, §52.7; (h))

- e) make available on their web site the Administrator-recognized holidays and distribute as necessary;
- f) log and track all Modified - UNP block applications using a tracking mechanism which will enable the Administrator and Applicant to identify a specific tens-block number request; and
- g) build and maintain an industry database which includes appropriate security for confidential data. The database will be accessible through an appropriate mechanism and, at a minimum, include the following information:
 - 1) all thousands-blocks available for tens-block assignment in the industry inventory pool (i.e., NPA-NXX-XXX level information displayed),
 - 2) status of the unassigned tens-blocks i.e., allocated/assigned, available,
 - 3) identification of the SP to which the tens-blocks has been allocated
- h) the Administrator shall provide user profile(s) that contain the SP contact information OCN, and level of access permitted. An SP may need multiple individual profiles and passwords (See Appendix 1 – User Profile Applications).

5.2 Assignment Processes

The Administrator shall:

- a) receive all requests for tens-block unassigned numbers from SPs and validate the requests to ensure each applicant meets the criteria to request tens-block numbers;
- b) verify that the applicant has completed the appropriate forms containing all of the pertinent information such as OCN (Operating Company Number), parent company OCN, AOCN (Administrative Operating Company Number), Tens-Block Effective Date;
- c) assist tens-block pool participants, as necessary, with the completion of all Tens-Block forms;
- d) allocate the tens-blocks sequentially from pristine blocks;

- e) select the specific unassigned numbers for assignment, or provide the reason to the SP why the assignment cannot be made;
- f) respond to the applicant's request(s) within 7 calendar days following receipt of the request by issuing the Part 3 - Administrator's Response/Confirmation form (Attachment 2) to the applicant.

5.3 Reporting Processes

The Administrator shall:

- a) prepare and publish reports as required by the industry, and regulatory authorities;
- b) treat SP specific data submitted to them as confidential and only publish data that has been aggregated;
- c) At end of the Modified - UNP Block Trial, numbers not assigned to end-users will be returned to the administrator. This is accomplished by a carrier with an unassigned trial number sending a "disconnect" message to NPAC for each inactive trial number and thus letting the industry's snap-back process take care of "returning" the number to the pooled thousand block. No action is required for numbers assigned to end-users. When the end-users eventually disconnect, the numbers will be returned likewise to the pool (or to the then assigned block owner) through the snap-back process. The administrator can obtain a report from NPAC for each thousand block immediately prior to and immediately after the clean-up activity to determine any utilization information it may require for its final report on the trial.⁵

5.4 Audits

In the performance of its duties and in meeting its responsibilities, the Administrator may encounter situations that may alert them to a possible noncompliance with the industry guidelines which warrants the need for a "for cause audit". In these situations, the Administrator will inform and forward relevant information, which contains the details of the possible infraction to the designated auditor or appropriate regulatory agency for disposition.

In addition, the Administrator may be required to provide SP specific data to an auditor in order to facilitate the audit process.

6.0 Allocation of Tens-Block Numbers

⁵ Note: This will require permission of the NAPM LLC.

6.1 Criteria for Tens-Block Number Allocation

The following criteria shall be used by the Administrator in reviewing a tens-block request from a SP:

- a) requests for tens-block assignments shall not be made more than 6 months prior to the requested Effective Date;
- b) the applicant must demonstrate that all applicable regulatory approvals required to provide the service for which the tens-block is required have been obtained;⁶
- c) applicants for initial resources must be able to provide documented proof that they are or will be capable of providing service within 60 days of the numbering resource activation date;⁷
- d) the applicant must demonstrate a need for a tens-block;⁸
- e) multiple tens-blocks may be requested on one Applications Form - Part 1A (Attachment 1) Tens-Block Application form. The Part 1A application form is structured per switch, per rate area;
- f) Tens-Block Numbers shall not be allocated to satisfy requests for vanity TNs;

6.2 Application Process

- 6.2.1 The applicants for tens-block assignments shall submit their requests to the Administrator using the Tens-Block Application Forms found on the Administrator's Web site. No requests and/or form submission will be accepted via fax, paper, voice, or e-mail, except in extraordinary circumstances and/or previously agreed to by the Administrator. Electronic transfer or e-mail will be accepted as "official signature."
- 6.2.2 The Administrator receives the Tens-Block Application Forms, (Part 1A) from the SP and the Tens-Block Months to Exhaust Certification Worksheet – TN Level (Appendix 3). Additional information and/or dialogue may be required by the Administrator with the applicant to facilitate application processing. The Administrator is required to respond to the applicant within seven (7) calendar days of receipt of the request.

⁶ FCC 00-104, ¶96

⁷ FCC 00-104, ¶ 96-97 § 52.15 (g) (2) (ii)

⁸ FCC 00-104, ¶ 96-97 §52.15 (g) (2) (ii)

- 6.2.3 Applicants requiring an Effective Date more than 28 calendar days after the date the Administrator receives the application should specify their desired Effective Date. An application without an Effective Date will be assigned the standard Administrator-assigned minimum Effective Date of 19 calendar days after the Allocation Date. The Administrator shall always assure a minimum of 19 calendar days between the Allocation Date and the Effective Date, unless requested otherwise through the expedite process (see Section 6.4).

SPs must allow at least two calendar days beyond the Effective Date prior to activating TNs within the assigned tens-block. For example, if the Effective Date is October 28, XXXX, a SP can start assigning TNs on October 30, XXXX. This is necessary in order to allow for NPAC processing and downloading to occur.

This 21 calendar day interval (i.e., from tens-block allocation through completion of NPAC processing) is necessary because of some SP's internal company notification processes, etc. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a tens-block. Such arrangements are outside the scope of these guidelines.

6.3 Process for Allocation of Tens-Blocks

- 6.3.1 For growth tens-block allocations, the following applicable criteria shall be used by the Administrator in reviewing a tens-block request from an SP:

The applicant must demonstrate that existing numbering resources for the rate center will exhaust within 6 months. The quantitative information required for a growth Tens-Block request is on the Tens-Blocks Months to Exhaust Certification Worksheet - TN Level (Appendix 3). The tens-block applicant should retain a copy in the event of an audit or regulatory initiative. In addition, the applicant must supply the Tens-Block Months to Exhaust Certification Worksheet and additional supporting information to the Administrator including:

- a) TNs available for assignment,
- b) incremental growth history of new TNs for the past 6 months, and
- c) projected incremental demand for new TNs in the next 12 months.

- 6.3.2 A tens-block assigned to a SP should be placed in service by the applicable activation deadline, that is, six months after the original effective date returned on Part 3 (Attachment 2). Confirmation that the tens-block has been placed in service is mandatory by submitting the Part 4 (Attachment 3) form to the Administrator. If the SP identified that they

will not meet the deadline, due to circumstances beyond their control, the SP may request an extension.⁹ If the Administrator does not receive the Part 4 (Attachment 3) Confirmation of the tens-block in service, the Administrator will start the reclamation process within 60 calendar days of the expiration of the applicable deadline.

6.4 Expedite Process for Tens-Block Allocation

A SP request for an expedited tens-block allocation will occur on an exception basis. The following procedures enable a SP to request an expedited allocation of a tens-block.

- a) The requesting SP will indicate on the Tens-Block Application Form – Part 1A (Attachment 1) that this is an expedited request for an allocation with its desired Effective Date.
- b) The Administrator will process the application if the request meets the criteria for the allocation of the tens-block and will make every effort to process the application in fewer than the current maximum 7 calendar days. The Administrator will expedite such requests when it can do so without failing to meet its 7 calendar day allocation interval for other SPs. The Administrator will determine the minimum Effective Date for an expedited request based upon the following considerations:
 - 1) If the tens-block allocated requires NPAC notification and is the first “port” within the NXX code, the Effective Date will be no earlier than twelve (12) calendar days after allocation (5 calendar days to build the 1K Block ownership table, 5 calendar days for a first “port” and 2 calendar days for LSMS downloads).
 - 2) If the tens-block allocated requires NPAC notification but is not the first “port”, then the Effective Date will be at least two business days after the Allocation Date.
- c) The SP will activate the tens-block and can begin customer assignments as soon as all NPAC processing and notification has occurred.

7.0 Appeals Process

Disagreements may arise between the Modified - UNP Administrator and Modified - UNP Trial applicants in the context of the administration of these guidelines. In all cases, the Administrator and Modified - UNP Block Applicants will make reasonable, good faith efforts to resolve such disagreements amongst themselves, consistent with these guidelines,

⁹ FCC 00-104, § 52.15 (i)(6)

prior to pursuing any appeal. Appeals may include, but are not limited to, one or more of the following options:

- a) The Modified - UNP Block Applicant will have the opportunity to resubmit the matter to the Administrator for reconsideration with or without additional input.
- b) Guidelines interpretation/clarification questions may be referred to the body responsible for maintenance of these guidelines, currently the CT DPUC. Unless otherwise mutually agreed to by the parties, these questions will be submitted in a generic manner protecting the identity of the appellant.
- c) The Administrator and Modified - UNP Block Applicant may pursue the disagreement with the appropriate regulatory authorities or their designate.

Part 1A Tens-Block Application FormGENERAL APPLICATION INFORMATIONType of Application: (Check one) ☐ New ☐ Change ☐ Disconnect**1.1 Contact Information:****Block Applicant:**

Company Name: _____

Headquarters _____

Address: _____

_____ City _____ State _____ Zip _____

Contact Name: _____

Contact**Address:**

_____ City _____ State _____

_____ Zip _____

Phone: _____ Fax: _____

E-Mail: _____

Modified - UNP Block Administrator¹:

Contact Name: _____

Contact Address: _____

_____ City _____ State _____ Zip _____

Phone: _____ Fax: _____

E-Mail: _____

1.2 General InformationNPA: _____ LATA: _____ OCNⁱⁱ: _____ AOCNⁱⁱⁱ: _____ Parent Company's OCN _____

Number of Tens-Blocks Requested: _____

Switch Identification (Switching Entity/POI)^{iv}: _____ N/A _____ City or Wire Center Name _____ N/A _____Rate Center^v: _____ Rate Center Sub Zone: _____ N/A _____**1.3 Dates**Date of Application^{vi}: _____ Requested Block Effective Date: _____

Request Expedited Treatment? Yes _____ No _____

1.4 Type of Service Provider Requesting the Tens-Block:

a) Type of Service Provider: _____ (LEC, IXC, CMRS, Other)

b) Primary type of service Blocks to be used for: _____ N/A _____

1.5 Type of Request

Initial block for rate center: Yes _____, If Yes attach evidence of authorization and proof of capability to provide Service within 60 days

Growth block for rate center: Yes____, If Yes, attach months to exhaust worksheet

Change block: Yes____, If Yes, indicate the NPA-NXX-Tens-Block(s) and reason for change:

Disconnect block: Yes____, If Yes, list the Tens-Block(s)_____

I hereby certify that the above information requesting a list of Tens-Block(s) is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Modified - UNP-Block (NPA-NXX-XXX Porting Administration Guidelines.

Signature of Block Applicant

Title

Date

Part 1A Tens-Block Application Form

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under “Block Applicant” the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Modified - UNP Block Administrator section also requires the Service Provider to fill in the Modified - UNP Block Administrator’s name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a tens-block assignment are required to fill in this section. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company and its Administrator Operating Company Number (AOCN) , or their LERG Routing Guide input designee’s AOCN. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of tens-blocks requested should be supplied. The Switch Identification as well as the city or wire center name is not required for the Modified – UNP Trial, rate center, (rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider is not required for the Modified – UNP Trial^{vi}. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested tens-block.

Section 1.4 Service Providers are not required to identify their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS for the Modified – UNP Trial. They also are not required to indicate the primary type of business in which the numbering resource is to be used for the Modified – UNP Trial.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for tens-blocks in a rate center, growth for additional tens-blocks in a rate center in which the applicant already has numbering resources. [SPs need to](#) provide the required evidence as ordered by the FCC.

The tens-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Foot Notes:

Appendix 2

Part 3 Tens-Block Response/Confirmation

***SP receiving the block(s) must port all numbers within the Ten-Block(s) into their network upon receipt of this Part 3 form with an activation date the UNP administrator has given.**

Date of Application _____ Block Effective Date _____
Date of Receipt _____ Date of Response _____
Service Provider Name _____
(Telcordia™ LERG™ Routing Guide) OCN-

NPAC SOA SPID _____

Modified - UNP Block Administrator Contact Information:

Phone _____
Signature of Modified - UNP Block Administrator _____
Name (print) _____ Fax _____
E-mail _____

____ **NPA-NXX-** **Block(s) Assigned** _____
Block(s) Disconnected _____

Block(s) Contaminated (Yes or No) _____
Block(s) Allocation Date _____

Switch _____ Identification _____ (Switching Entity / POI)¹⁰
____ N/A _____
Rate Center _____
Rate Center Sub Zone ____ N/A _____

____ **Form complete, block request denied**
Explanation: _____

____ **Assignment activity suspended by the administrator**

¹⁰ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI™ *Location Identification Code* of the switching entity/POI shown on the Part 1A form. (Telcordia, LERG Routing Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

Explanation:

Further Action:

Part 4 Tens-Block Application Form

Confirmation of Tens-Block(s) In Service

By signing below, I certify that the block(s) in (NPA-NXX-XXX) specified in Section 1 below is (are) activated and assignment of the numbers has commenced and is(are) being used for the purpose specified in the original application.¹¹

Print Name of Authorized Representative
of Company/Entity

Signature

Title

Date

1. NPA-NXX-XXX block(s):

2. Switch Identification (Switching Entity /
POI)¹²: _____ N/A _____

¹¹ FCC 00-104 ¶ 237.

¹² This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. It is the 11-character COMMON LANGUAGE Location Identification (CLLI™) of the switch/POI shown on the Part 1A form.

3. Date block(s) put in service:

Note: The CTDPUc may request proof from all block holders that NPA-NXX-XXX block(s) have been activated and assignment of the numbers has commenced.¹³

Date of Block

Allocation: _____

¹³ FCC 00-104 ¶ 237.

Tens-Block User Profile Application

This form must be completed to designate authorized users of the industry database. Applicants requiring more than one user must submit a separate application for each user, to submit Tens-Block(s) application(s) to the Modified - UNP Block Administrator . Before assigning a password, The Modified - UNP Block Administrator, for security verification, shall verify that the applicant is authorized to access the industry database¹. In addition, this form is also used when there is any change to an established user profile.

New Application _____ Change _____ Remove _____

User Contact Information

COMPANY: _____ OCN: _____

User Name: _____

Title: _____

Address: _____

City, State, Zip: _____

Phone: _____

FAX: _____

E-mail: _____

Company contact name & phone number to verify authorization: _____

Levels of User Access Requested

Level(s) of user access to information will be set by the Modified - UNP Block Administrator according to the following hierarchy. Note: each level incorporates all preceding levels.

Please select the specific level of access and identify the specific access areas that are to be assigned to this User Profile from the following:

NPA(S): _____

STATE(S): _____

COMPANY OCN(S): _____

This application is for read only access _____(Y or N).

This application is for submission of Tens - block applications and/or changes _____(Y or N).

¹ If the user name is not the same as the Company/OCN contact name in the CO Code Administration database or in the Telcordia™ LERG™ Routing Guide for that NXX, then the Modified - UNP Block Administrator must contact the SP to verify authorization request. (Telcordia and LERG Routing Guide are trademarks of Telcordia Technologies, Inc.)

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET – TN Level ¹⁴
(Tens-Block Growth Block Request)

Date: _____ OCN: _____ Company Name: _____
Rate Center: _____
List all Codes NPA(s)-NXXs, Blocks NPA(s)-NXX-X(s) and Tens-Blocks NPA(s)-NXX-XXX:

Name of Block Applicant: _____ Signature: _____
Title: _____ Telephone No.: _____ FAX No.: _____
E-Mail: _____

A. Available Numbers: _____

B. Assigned Numbers: _____

C. Total Numbering Resources: _____

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: _____
List excluded Code(s) or Block(s): _____

	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
--	-------------	-------------	-------------	-------------	-------------	-------------	-------------	-------------	-------------	--------------	--------------	--------------

E. Growth History – Previous 6 _____ months¹⁵

F. Forecast – Next 12 months¹⁶ _____

G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6): _____

H. Months to Exhaust¹⁷ $\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$ = _____

I. Utilization¹⁸ $\frac{\text{Assigned Numbers (B)} - \text{Excluded Numbers (D)}}{\text{Total Numbering Resources (C)} - \text{Excluded Numbers (D)}}$ * 100 = _____

¹⁴ A copy of this worksheet is required to be submitted to the Modified-UNP Block Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

¹⁵ Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

¹⁶ Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

¹⁷ To be assigned an additional tens-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (iii)).

¹⁸ Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Explanation:

ATTACHMENT 3

October 8, 2002

In reply, please refer to:

Docket No. 01-05-18:UR&R:PAP

Motion No. 4

Jennifer J. Marrapese, Esquire
Vice President, Regulatory Affairs
Cox Connecticut Telcom, L.L.C.
111 Comstock Parkway
Cranston, Rhode Island 02921

Re: Docket No. 01-05-18, DPUC Intent to Conduct a Voluntary Unassigned Porting (UNP) Trial

Dear Ms. Marrapese:

The Department of Public Utility Control (Department) acknowledges receipt of the Cox Connecticut Telcom L.L.C. (Cox or Company) letter (Letter) dated August 29, 2002, requesting that the Department direct the industry to implement an Unassigned Number Porting (UNP) trial immediately, to run a UNP trial concurrently with the proposed "Modified UNP" trial, or in the alternative, to direct the industry to develop guidelines for a UNP trial by year-end 2002, for implementation 30 days after completion of those guidelines.¹⁹ Letter, p. 1.

Cox argues that since it has taken more than five months to develop the guidelines for the Modified UNP trial, it is reasonable that the group continue to refine the Business Rules in preparation for the real UNP trial. Cox also argues that the industry group will not analyze the results of the Modified UNP trial until three months after the official start date and that there is no need to wait until the Modified UNP trial is complete before finalizing the Business Rules for a real UNP trial. In the opinion of Cox, unless the industry works on the two trials concurrently, results from a real UNP trial will not likely be available for at least another year, if not longer. Id., p. 2.

¹⁹ The Letter follows correspondence submitted by Cox on December 17, 2001, wherein the Company urged the Department to direct the industry and the proposed UNP pooling administrator, Neustar, Inc., to conduct a UNP trial immediately. Cox also outlined its concerns about the Modified UNP trial being proposed by the Connecticut industry group in that correspondence. Specifically, Cox believed that the industry has attempted to thwart the Department's trial by defining a new form of "modified UNP," which is nothing more than number pooling using blocks of 10 numbers. Letter, p. 2. Finally, in its December 17, 2001 letter, Cox requested that the Department order the industry to continue developing a process for a UNP trial to commence not more than 90 days after the introduction of the Modified UNP trial. Cox December 17, 2001 letter to Louise E. Rickard, Acting Executive Secretary, pp. 1 and 4.

Cox concludes that under the current plan, UNP cannot be trialed until 2003. Accordingly, Cox requests that the Department order the industry to finalize guidelines for the UNP trial by year-end 2002. Cox also requests that the Department direct the carriers who wish to participate in the trial to implement the trial within 30 days of the completion of the guidelines. Id., p. 3.

The Department intends to commence a two-phased UNP trial beginning on November 1, 2002, that will be open to all providers certified to offer telecommunications services in the state. This trial was designed by the participating carriers to allow for maximum voluntary participation and will employ the use of a surrogate form of UNP during Phase I and the actual porting of individual telephone numbers between service providers during Phase II. Specifically, during Phase I, a surrogate UNP trial will be conducted for three months wherein participating carriers would request telephone numbers (TN) from the industry's pooling inventory. At the conclusion of the three-month period, the data will be reviewed by the Department and the industry in order to determine whether to conclude the trial, continue Phase I or immediately move to Phase II of the trial. The Department expects that during Phase II, carrier to carrier exchanges of TNs in inventory for use by the receiving carrier for growth or footprint resources would occur in which participating service providers will request telephone numbers from each other providers' inventories that would not involve a third party administrator.

The Department notes that the Federal Communications Commission (FCC) has permitted this trial with the stipulation that participation in the trial by the carriers be voluntary. Over the course of this proceeding, Cox has expressed concern that the first phase of the trial as proposed, amounted to nothing more than pooling in 10-number blocks and that it would not be until the second phase of the proposed trial would UNP (as described by the FCC) actually commence. See for example the December 12, 2001 Technical Meeting Final Minutes, p. 5; Cox December 17, 2001 Letter to the Department, pp. 1 and 2. In response to Cox's concerns, the industry group indicated that they would not participate if Cox's suggestions were accepted by the Department. See the December 12, 2001 Technical Meeting Final Minutes, p. 5. Since the FCC has required that participation in the UNP trial be on a voluntary basis, the Department is concerned that with the exception of Cox, no other carrier would participate in the trial if the Company requests are accepted. Therefore, Cox's requests to run a UNP trial immediately or concurrent with the Modified UNP trial are hereby denied.

Lastly, the Department and the industry group have agreed to review the Modified UNP trial results after three months. After review of that data, the Department and the industry group will make a determination as to how it will proceed with the Connecticut trial. Therefore, the Department will defer its decision to direct the industry to develop guidelines for a UNP trial until that time.

Sincerely,

DEPARTMENT OF PUBLIC UTILITY CONTROL

Louise E. Rickard
Acting Executive Secretary

cc: Service List

ⁱ The Modified - UNP Block Administrator is available to assist in completing these forms.

ⁱⁱ Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).

ⁱⁱⁱ Administrative Operating Company Number (AOCN) provided by the SP is the AOCN authorized to perform updates to the switch information on the BCD screen

^{iv} This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ code of the switch /POI.

^v Rate Center name must be a tariffed Rate Center.

⁸ Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

^{vii} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.